

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIAN FLORES, aka JULIAN FLORES
SANCHEZ,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 2:21-CV-00006-RSL

AMENDED JOINT MOTION AND
ORDER TO STAY ALL DEADLINES

The parties respectfully move the Court to stay the case until September 15, 2023, and to extend all remaining deadlines accordingly. In support of their joint motion, the parties propose the following stipulation to the Court, and request the Court adopt the stipulation and enter the proposed order:

1. The parties have exchanged written discovery, have met and conferred on multiple occasions, and have agreed on Rule 30(b)(6) deposition topics for Defendant Wells Fargo Bank, N.A., but the parties have not exchanged document production or taken depositions. The parties have also engaged in informal discussions regarding possible resolution of the case. As a result of those discussions, the parties have agreed to conduct an in-person, one-day mediation in Seattle, Washington, before the Honorable Paris Kallas. The mediation before Judge Kallas is scheduled to take place on September 12, 2023. Given the demands of the schedules of the parties, their counsel, and Judge Kallas, September is the

earliest time at which the mediation can take place.

2. To preserve the parties' limited resources and to facilitate a productive mediation session, the parties stipulate that a stay of pending case deadlines is warranted, including without limitation the discovery deadlines, until after the mediation is concluded.

3. Notwithstanding the stay of pending case deadlines, plaintiff shall have leave to serve, on or before May 11, 2023, a subpoena for documents on Farmers Insurance Co. of Washington. No other discovery shall be conducted without leave of Court.

4. The parties further stipulate to the following amended case schedule, which would take effect upon the expiration of the stay if the matter does not resolve at mediation:

| Event | Current Date | Amended Date |
|--|-------------------------|--------------------------|
| Deadline to Amend Pleadings | August 9, 2023 | March 7, 2024 |
| Expert Witness Reports | August 9, 2023 | February 7, 2024 |
| Discovery Completed | October 10, 2023 | May 6, 2024 |
| Settlement Conference Completed | October 23, 2023 | May 20, 2024 |
| Dispositive Motions | November 7, 2023 | May 6, 2024 |
| Motions in Limine | January 8, 2024 | August 9, 2024 |
| Agreed Pretrial Order Due | January 24, 2024 | August 23, 2024 |
| Trial Briefs, Proposed Jury Instructions, and Trial Exhibits Due | January 31, 2024 | August 30, 2024 |
| Trial | February 5, 2024 | September 9, 2024 |

5. Additionally, the parties agree that they will file a stipulated protective order by September 20, 2023 and exchange document production within five business days of the court's order on that stipulation.

6. This parties bring this motion in good faith, and the request for a stay and extension of pending case deadlines is supported by good cause as demonstrated above.

7. The parties respectfully request that the Court grant this joint motion and enter this stipulation as an order of the Court.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: May 15, 2023

/s/ Peter A. Talevich

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 15th day of May, 2023.



Honorable Robert S. Lasnik
United States District Court Judge